

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CLINGMAN & HANGER
MANAGEMENT ASSOCIATES, LLC,
as Trustee of the Furie Litigation Trust,
Plaintiff,

V.

KAY RIECK; LARS DEGENHARDT;
THEODOR VAN STEPHOUDT; DAVID
HRYCK, REED SMITH LLP; THOMAS
E. HORD; MICHAEL ANTHONY
NUNES; STONE PIGMAN WALTHER
WITTMAN LLC, in its own capacity and
as successor by merger to COGAN &
PARTNERS LLP; DAVID ELDER;
BRUCE GANER; SIERRA PINE
RESOURCES INTERNATIONAL, INC.;
and HELENA ENERGY, LLC,
Defendants.

[illegible]

Civil Action No. 4:21-cv-02698

**DEFENDANT REED SMITH LLP'S UNOPPOSED MOTION
TO EXTEND TIME TO ANSWER**

TO THE HONORABLE CHARLES R. ESKRIDGE III:

Defendant Reed Smith LLP (“Reed Smith”) respectfully requests an extension of time to October 1, 2021 to answer, move, or otherwise respond to Plaintiff’s state-court petition, which was removed to this Court in the above-styled and numbered civil action.

Plaintiff filed its Original Petition (“Petition”) on August 6, 2021, and it was assigned to the 334th District Court of Harris County, Texas. The current deadline for Reed Smith to answer is **September 7, 2021**. *See* FED. R. CIV. P. 81(c)(2)(A).

Due to the complexity of the matters at issue and the need for additional preparation time, Reed Smith respectfully requests an extension of time—to **October 1, 2021**—to file an answer, move, or otherwise respond to the Petition.

Plaintiff does not oppose this extension.

WHEREFORE, premises considered, Defendant Reed Smith LLP respectfully requests that the Court extend its deadline to answer, move, or otherwise respond to Plaintiff's lawsuit to October 1, 2021.

DATED: September 3, 2021

Respectfully Submitted,

GIBSON, DUNN & CRUTCHER LLP

/s/ Collin J. Cox

Collin J. Cox

Federal ID No. 654469

State Bar of Texas No. 24031977

ATTORNEY FOR DEFENDANT

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CERTIFICATE OF CONFERENCE

I hereby certify that prior to filing the above Unopposed Motion to Extend Time to Answer, the undersigned conferred with opposing counsel, Robert Corn, regarding the relief sought in this Motion. He is unopposed to the requested extension of time.

/s/ Collin J. Cox

Collin J. Cox

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above Reed Smith, LLP's Unopposed Motion to Extend Time to Answer has been served on the following counsel/parties of record in accordance with FED. R. CIV. P. 5 and local rules for electronic filing and service on this 3rd day of September 2021:

Robert M. Corn, Counsel for Plaintiff

George M. Kryder, III, Counsel for Stone, Pigman, Walther, Wittman, LLC

William P. Haddock, Counsel for Helena Energy, LLC

/s/ Collin J. Cox

Collin J. Cox